

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

APRIL DEBOER, *et al*,

Plaintiffs,

v

RICHARD SNYDER, *et al*

Defendants.

Civil Action No. 12-cv-10285

HON. BERNARD A.  
FRIEDMAN

MAG. MICHAEL J.  
HLUCHANIUK

**STIPULATION AND  
PROTECTIVE ORDER  
REGARDING STATE  
DEFENDANTS' EXPERT  
LOREN MARKS**

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**STIPULATION AND PROTECTIVE ORDER REGARDING  
STATE DEFENDANTS' EXPERT LOREN MARKS**

The parties, through their attorneys, stipulate to the entry of a protective order as follows:

1. The Plaintiffs have requested discovery regarding a study authored by Dr. Loren Marks, one of the State Defendants' expert witnesses. Specifically, Plaintiffs seek the names of the individuals that Dr. Marks provided a copy of a draft of his article entitled *Same-Sex parenting and children's outcomes: A closer examination of the American psychological association's brief on lesbian and gay parenting* before it was published in Social Science Research.

2. Plaintiffs maintain that the disclosure of these names is necessary in order for them to properly prepare for trial.

3. State Defendants' counsel will send Plaintiffs' attorneys the names of the individuals provided by Dr. Marks, as referenced in paragraph 1, subject to the following terms and conditions:

a. The Plaintiffs and their attorneys are subject to this protective order and may only use the names for purposes of the instant litigation and not for any other purpose and only subject to this Court's orders.

b. The Plaintiffs and their attorneys will not disclose the names by any means, in whole or in part, to any person, including Plaintiffs' experts, Defendant Brown, or Defendant Brown's counsel.

c. While the parties are not in agreement as to the admissibility of the names into evidence, in the event Plaintiffs or their attorneys seek to admit the names into evidence, they will provide 24-hour prior notice to State Defendants' counsel and agree to have an in-chambers meeting with the Court before the names are sought to be admitted.

It is so STIPULATED.

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It is so ORDERED.

Date February 13, 2014

s/ Bernard A. Friedman  
Hon. Bernard A. Friedman  
United States District Judge